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Received:

Feb 16, 2021

8:40 PM

GOVERNMENT OF PUERTO RICO PUERTO RICO PUBLIC SERVICE REGULATORY BOARD PUERTO RICO ENERGY BUREAU

IN RE:

PROCESS FOR THE ADOPTION OF REGULATION FOR DISTRIBUTION RESOURCE PLANNING CASE NO.: NEPR-MI-2019-0011

SUBJECT:

Motion submitting project work schedules charts in compliance with the order issued by the Energy Bureau during the compliance hearing of February 10, 2021, and submitting a revised schedule for the power grid inventory.

MOTION IN COMPLIANCE WITH ORDER SUBMITTING PROJECT WORK SCHEDULES CHARTS AND SUBMITTING A REVISED SCHEDULE ON THE POWER GRID INVENTORY

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW, LUMA ENERGY, LLC, and LUMA ENERGY SERVCO, LLC (collectively, LUMA), through the undersigned legal counsel and respectfully state and request the following:

- 1. On February 10, 2021, LUMA appeared before this honorable Puerto Rico Energy Bureau (Bureau) for a compliance hearing that was scheduled by the Bureau in a Resolution and Order dated December 31, 2020 (December 31st Order).
- 2. In advance of the compliance hearing and as requested in the December 31st Order, LUMA and the Puerto Rico Electric Power Authority (PREPA) submitted a work plan and schedule to map the distribution system's interconnection capacity and to prepare an inventory of the power system. *See* Joint Motion filed on January 29, 2021 and Joint Motion submitting amended work plan, dated February 1, 2021). The work plan was filed in pdf format.

- 3. Also in compliance with the December 31st Order, on February 5, 2021, LUMA and PREPA jointly filed a pdf copy of the presentation that was to be offered at the February 10th compliance hearing on the work plan.
 - 4. The compliance hearing was held on February 10, 2021, via video conference.
- 5. Mr. Hugo Bashualdo, Principal Advisor to LUMA, took the lead on LUMA's presentation on the work plans for the preparation of preliminary maps of interconnection capacity and the power grid inventory. Also present were LUMA representatives Mr. Mario Hurtado, Vice President Regulatory, Don Cortez, Vice President Utility Transformation, and Darrell Wilvers, Asset Management, Functional Lead. All of the LUMA representatives answered questions from the Commissioners.
- 6. In response to questions by the Commissioners, LUMA representatives offered to revise the work schedule for the power grid inventory (Order 3), to include a request for proposals (rfp) for outsourcing field inspections.
- 7. Additionally, during the proceedings of the compliance hearing, the Bureau noted that some of the information on the schedule was not fully visible. The Bureau requested that LUMA file, within five days, a copy of those work schedules charts in electronic format.
- 8. The aforementioned project work schedules charts are being submitted with the Bureau via email.
- 9. Several items of the work schedule on order 3 (Power Grid Inventory) were revised to include the rfp for outsourcing field inspections.
- 10. The undersigned discussed this filing with PREPA's counsels. They authorized the undersigned to certify that PREPA agrees with this submission.

WHEREFORE, LUMA respectfully requests that the Energy Bureau accept the filing of the project work schedules charts and deem that LUMA complied with the Bureau's order issued in the compliance hearing of February 10, 2021, granting LUMA and PREPA five days to submit the work schedules charts.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th day of February 2021.

I hereby certify that I filed this motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this motion to the attorneys for PREPA, Joannely Marrero-Cruz, jmarrero@diazvaz.law; and Katiuska Bolaños-Lugo, kbolanos@diazvaz.law.

/s/ MARGARITA MERCADO ECHEGARAY Margarita Mercado Echegaray DLA Piper (Puerto Rico) LLC PR Bar No. 16,266 Suite 401500 Calle de la Tanca San Juan, PR 00901-1969 787-945-9101 margarita.mercado@us.dlapiper.com